



To Whom it May Concern  
Independent Technical Panel  
California Department of Water Resources

December 16, 2013

From: Ron Stork, Policy Director, Friends of the River

Re: Recommendation on sections 10631 (f) and (g) of the CA Water Code

It was with great interest that I read the recommendation on changes to the CA Water Code. The Friends of the River has been a long time member of the California Urban Water Conservation Council (Council) and the Sacramento Water Forum and is very familiar with the Best Management Practices and the discussions about specific implementation issues. We support updating the list of the Demand Management Members (DMMs) in the Code to more closely resemble the list of BMPs that are pursued by the volunteer members of the Council. The list of BMPs was updated in 2008, and has added water loss control in 2009. However, the list in the proposed revision only includes the 'foundational' BMPs, and does not make mention of water agencies clearly articulating the scope and delivery of their programmatic BMPs with either traditional or flexible approaches.

The Flex Track measures have been researched and are being updated by the Council through the potential BMP studies, so adding the ability for water agencies to specify that they are pursuing well-researched and clearly documented programs also seem like a benefit to the State of California's water planning process. The traditional approach to programmatic BMPs gives agencies which are starting out, or which have more limited planning resources, some tried and true methods for accomplishing their water conservation goals.

We think that the proposed changes to Sections 10631 (f) and (g) go too far in the wrong direction. Changing the language which requires an agency to describe its DMMs in terms of a "narrative," will remove the quantification needed to determine if water savings are being achieved through water conservation programs, through codes and ordinances, or through changes in population.

The ITP's rationale for making these changes is tied to a section of water code passed in 2009 (10608.16-10608.44) that requires water agencies to include a calculation for their GPCD target for 2020, and show progress by 2015. That same section of the code (10608.42) requires the CA DWR to adjust the targets based upon whether agencies'

targets will achieve a 20% reduction in per capita water demand. In its 2012 report to the legislation DWR indicated that the targets submitted in the 2010 UWMPs are not ambitious enough to reach the 20% goal. Without quantifiable information about what agencies are accomplishing and how they are accomplishing it in the 2015 plans, DWR will be hard pressed to make good recommendations which have a chance of reducing per capita consumption statewide by 20% in 2020.

The purpose of the Urban Water Management Plans is to both ensure that local communities are prepared for inevitable droughts and to assure the state as a whole that such preparations will eliminate the need for emergency measures such as those needed in the droughts of the 1970s and 1980s in California. Removing the requirements for quantifying a water agency's water conservation efforts simply because in 2015 they appear to be headed on a path to achieve a target defined in 2010, which will be redefined in 2016 or 2017 in order to meet the 20% goal in 2020, is shortsighted.



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